

KEKER  
VAN NEST  
& PETERS

LATHAM & WATKINS LLP

MORRISON FOERSTER

August 4, 2025

**VIA ECF**

Hon. Ona T. Wang  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street  
 New York, NY 10007-1312

Re: *In re OpenAI, Inc., Copyright Infringement Litigation*, 25-md-3143 (SHS) (OTW)  
 This Document Relates To: All Cases

Dear Judge Wang:

Per the Court's Order at ECF 78, please find attached, on behalf of all parties, three charts that contain both summaries of the discovery disputes that are the subject of pending motions as well as updates regarding the parties' previous discovery disputes. Exhibit A contains a chart summarizing the discovery disputes in the News Cases. Exhibit B contains a chart summarizing the discovery disputes in the Class Cases. Exhibit C contains a chart summarizing a discovery dispute in both the News and Class Cases.

Respectfully,

KEKER, VAN NEST &  
PETERS LLP

/s/ Christopher S. Sun\*  
 Christopher S. Sun

LATHAM & WATKINS LLP

/s/ Elana Nightingale Dawson  
 Elana Nightingale Dawson

MORRISON &  
FOERSTER LLP

/s/ Rose S. Lee\*  
 Rose S. Lee

cc: All Counsel of Record Line (via ECF)

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\* All parties whose electronic signatures are included herein have consented to the filing of this document.